

**Comments of the Lower Platte River Natural Resources Districts, Nebraska
Before the Assistant Secretary of the Army for Civil Works and
the U.S. Army Corps of Engineers
On the Principles and Guidelines for Water and Related Land Resources and
Initiation of Revision and Request for Suggested Changes**

June 5, 2008

The Lower Platte River Natural Resources Districts in Nebraska include the Lower Platte South, the Lower Platte North, and the Papio-Missouri River Natural Resource Districts established under Nebraska state law. These substate Districts provide planning and management services for water and other natural resources in the Lower Platte basin on a collaborative basis.

The Lower Platte NRDs have also formed the Lower Platte Corridor Alliance with six Nebraska state government agencies, and work closely with local governments in the basin to address future water quantity and water quality needs in this area of expanding population between Lincoln and Omaha. This region includes exurban growth, high agricultural production, and surface and ground water resources serving the most populated part of Nebraska which will soon include approximately half of the state's population.

The Lower Platte NRDs have worked closely and collaboratively with the Corps of Engineers for many years on three major and several other water resource projects. The authority that initiated planning for these projects is the Lower Platte River and Tributaries Program administered by the Corps's Omaha District.

The three major projects, authorized by the Water Resources Development Act ("WRDA") of 2000, include the Antelope Creek flood damage reduction project; the Western Sarpy-Clear Creek flood damage reduction project protecting water resources and infrastructure serving the Lincoln and Omaha region; and the Sand Creek Environmental Restoration Project which is restoring

wetlands serving the Central North American Flyway and includes flood damage reduction benefits.

Together these projects have pursued multiple integrated objectives for the watershed including flood damage reduction; protection of public health, safety and welfare for water and vital public infrastructure; and by providing multiple environmental outputs and economic benefits to the basin, its communities, Nebraska and the nation as a whole.

These multiple objectives are to be further pursued on a collaborative and systems basis with state agencies, local governments, the Corps and other federal agencies under the Lower Platte River Watershed Restoration Project established by the Congress in WRDA '07.

Many changes affecting the nation's water resources have occurred since 1983. As a nation, we have experienced expanding population and development; strong national and international economic activity with associated benefits and externalities; heightened concerns for environmental quality and climate change; demands on agriculture production; energy challenges; and stronger resource information, science, and technologies to make informed decisions.

If anything, these changes have only served to heighten the national importance that water provides to American families, the nation, states, and communities, both urban and rural.

All these changes require the strengthening of the Corps's missions in close collaboration with communities, states which possess fundamental legal authorities, substate regional agencies, and other federal agencies which possess expertise so vital to informed decision making. Those federal agencies include the U.S. Geological Survey, the Environmental Protection Agency, the Natural Resources Conservation Service; the National Oceanic and Atmospheric Administration; and the Federal Emergency Management Agency, among others.

Congress has established other key water planning authorities. The federal Clean Water Act provides parallel authority for state and local water quality management planning under Sections 303(e) and 208. The federal Safe Drinking Water Act includes similar authorities to protect source waters.

These responsibilities have been recognized in interagency agreements such as the one on watershed management between the Director of Civil Works and the EPA Assistant Administrator for Water, and such agreements should be extended to meet intensifying demands for clean water.

How would the nation do without the Corps and its federal agency partners?

Strengthening the Principles and Guidelines

Updated Principles and Guidelines should strongly speak to collaboration recognizing that collectively, federal agency programs can provide major national, local and state benefits for water management.

Revised Principles and Guidelines should articulate the following:

First, substate and state water agency programs must be strengthened and assisted as a central part of the effort to pursue planning to meet national challenges and demands. This means that the Corps's missions should be expanded to include a clear declaration for collaboration and assistance to substate and state planning and management and that this principle should be affirmed beginning with the new P&Gs;

Second, planning and management should intensify the use of watersheds of all sizes and include the integration of surface and ground water considerations while recognizing that the states maintain the critical role for the latter. Nebraska and its Natural Resources Districts have been integrating water

resource management for many years and the Nebraska Legislature has further strengthened this approach in this decade;

Third, investments in policy, scientific, technical and management information must be strengthened by the Congress and state legislatures and include closer collaboration by federal agencies and their state, substate and university counterparts; and

Fourth, local governments, Congress and the states must prepare to expand investments in water resources and water quality by looking to additional and alternative public revenue sources to provide for the challenges and demands known now and those ahead.

Congress has given the Corps wide latitude in Section 2031 to update the Principles and Guidelines. We urge that these values be reflected in the new P&Gs. Many other national studies, agencies and venues will be considering these challenges in the coming months to which the updated P&Gs can inform and contribute.